

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA)
)
)
) No. 1:19-cr-59
)
)
DANIEL E. HALE,) Hon. Liam O'Grady
)
)
Defendant.)

**DEFENSE NOTICE OF WAIVER OF SPEEDY TRIAL
AND PRESENCE AT STATUS CONFERENCE**

Comes now defendant, Daniel Everette Hale, through counsel, who states:

1. Trial in this matter had been previously set for June 22, 2020.

However in light of the global novel coronavirus pandemic, and in consultation with the parties, this Court removed the trial date from the docket and scheduled a status conference for May 8, 2020. Thereafter, Virginia Gov. Ralph Northam extended the state's stay-at-home order through June 10, 2020, in light of the continued spread of COVID-19.

2. The parties have conferred regarding a revised trial schedule and consulted with the Court. As a result of those consultations, the parties have agreed to a new trial date of December 1, 2020, along with certain other deadlines prior to the trial's commencement. As a result, there is no longer a need for a status conference on May 8, 2020.

3. Defense counsel have consulted regarding these matters with Mr. Hale. Specifically, defense counsel have discussed with Mr. Hale his rights under

the Speedy Trial Act, 18 U.S.C. § 3161, and his right to be present at a status conference, *see, e.g.* Fed. R. Crim. P. 43.

4. Through his signature below, Mr. Hale confirms that he waives his right to be present at the May 8, 2020 status conference, and that he consents to a trial beginning on December 1, 2020, and waives his rights under 18 U.S.C. § 3161 for this purpose.

Acknowledgement:



Daniel Everett Hale
Dated: May 8, 2020

Respectfully submitted,

DANIEL E. HALE
By Counsel

/s/ Cadence Mertz
Todd M. Richman
Va. Bar No. 41834
Cadence Mertz
Va. Bar No. 89750
Assistant Federal Public Defenders
Office of the Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0840 (T)
(703) 600-0880 (F)
Cadence_Mertz@fd.org

CERTIFICATE OF SERVICE

I hereby certify that on May 8, 2020, I will electronically file the foregoing pleading with the Clerk of the Court using the CM/ECF system, which will then send a notification of such filing (NEF) to counsel of record.

/s/ Todd M. Richman
Todd M. Richman
Assistant Federal Public Defender
Office of the Federal Public Defender
1650 King Street, Suite 500
Alexandria, Virginia 22314
(703) 600-0845 (T)
(703) 600-0880 (F)
Todd_Richman@fd.org